

HONORABLE WHITMAN L. HOLT

ARMAND J. KORNFELD, WSBA #17214  
AIMEE S. WILLIG, WSBA #22859  
JASON WAX, WSBA #41944  
BUSH KORNFELD LLP  
601 UNION STREET, SUITE 5000  
SEATTLE, WA 98101-2373  
Tel: (206) 292-2110  
Emails: jkornfeld@bskd.com  
awillig@bskd.com  
jwax@bskd.com

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WASHINGTON

In re

ICAP ENTERPRISES, INC., et al.,  
Debtors.<sup>1</sup>

No. 23-01243-WLH11  
(Jointly Administrated)

SECOND MONTHLY FEE  
APPLICATION OF CORR CRONIN  
LLP FOR ALLOWANCE AND  
PAYMENT OF INTERIM  
COMPENSATION AND  
REIMBURSEMENT OF EXPENSES  
FOR THE PERIOD OF  
NOVEMBER 1, 2023 THROUGH  
NOVEMBER 30, 2023

<sup>1</sup> The Debtors (along with their case numbers) are iCap Enterprises, Inc. (23-01243-11); iCap Pacific NW Management, LLC (23-01261-11); iCap Vault Management, LLC (23-01258-11); iCap Vault, LLC (23-01256-11); iCap Vault 1, LLC (23-01257-11); Vault Holding 1, LLC (23-01265-11); iCap Investments, LLC (23-01255-11); iCap Pacific Northwest Opportunity and Income Fund, LLC (23-01248-11); iCap Equity, LLC (23-01247-11); iCap Pacific Income 4 Fund, LLC (23-01251-11); iCap Pacific Income 5 Fund, LLC (23-01249-11); iCap Northwest Opportunity Fund, LLC (23-01253-11); 725 Broadway, LLC (23-01245-11); Senza Kenmore, LLC (23-01254-11); iCap Campbell Way, LLC (23-01250-11); UW 17th Ave, LLC (23-01266-11); VH Willows Townhomes LLC (23-01262-11); iCap @ UW, LLC (23-01244-11); VH 2nd Street Office, LLC (23-01259-11); VH Pioneer Village LLC (23-01263-11); iCap Funding LLC (23-01246-11); iCap Management LLC (23-01268-11); iCap Realty, LLC (23-01260-11); Vault Holding, LLC (23-01270-11); iCap Pacific Development LLC (23-01271-11); iCap Holding LLC (23-01272-11); iCap Holding 5 LLC (23-01273-11); and iCap Holding 6 LLC (23-01274-11); Colpitts Sunset, LLC (23-01432-11); CS2 Real Estate Development LLC (23-01434-11); and iCap International Investments, LLC (23-01464-11).

1 John Bender and Corr Cronin LLP (the “Firm”) submits this Monthly Fee  
2 Application Request for Compensation and Reimbursement of Expenses for the Period  
3 of November 1, 2023 through November 30, 2023 (“the Application” and the  
4 “Application Period” respectfully for work performed for the Official Committee of  
5 Unsecured Creditors (“Committee”). In support of the Application, the Firm  
6 respectfully represents as follows:

7 The Firm is special litigation counsel to the Committee. The Firm hereby applies  
8 to the court for allowance and payment of interim compensation for services rendered  
9 and reimbursement of expenses incurred during the Application Period.

10 1. The Firm billed a total of \$21,056.00 in fees and expenses during the  
11 Application Period. The total fees represent 43.40 hours during the period covered by  
12 this Application. The fees and expenses break down as follows:

Period	Fees	Expenses	Total
11/01/2023 to 11/30/2023	\$21,056.00	\$0.00	\$21,056.00

16 2. Accordingly, the Firm seeks allowance of interim compensation in the  
17 amount of a total of \$21,056.00 at this time. This total is comprised of \$21,056.00, the  
18 fees for services rendered. The Firm will only apply 80% of the fees paid to outstanding  
19 invoices and will hold the additional 20% of the fees in trust pending approval of such  
20 fees through a quarterly interim fee application.

21 3. This is the second monthly fee application of the Firm. Accordingly, to  
22 date, the firm has not been paid post-petition and is not holding any amounts in trust.  
23

1           4. Attached as **Exhibit A** to this Application is the name of each professional  
2 who performed services in connection with this case during the period covered by this  
3 Application and the hourly rate for each such professional. Attached as **Exhibit B** to  
4 this Application are detailed time and expense statements for the Application Period.

5           5. The Firm has served a copy of this Application on the applicable Notice  
6 Parties. The Application was mailed by first class mail, postage prepaid on or about  
7 January 17, 2024. Notice of the filing of this Application was served on the foregoing  
8 parties as well as any party who has requested special notice in these chapter 11 cases  
9 as of the date of this Notice.

10           6 Pursuant to this court's *Order Granting Debtors' Motion for Order*  
11 *Establishing Interim Fee Application and Expense Reimbursement Procedures* that was  
12 entered on or about November 17, 2023, ("Compensation Procedures Order"). the  
13 Debtors are authorized to make payment requested herein without a further hearing or  
14 order of this court unless an objection to this Application is filed with the court and  
15 served upon the Notice Parties within 14 calendar days after the date of mailing of the  
16 Notice of this Application. If such an objection is filed, the Debtors are authorized, but  
17 not direct to pay 100% of the uncontested fees and expenses without further order of  
18 this court. If no objection is filed, the Debtors are authorized, but not directed to pay  
19 00% of all fees and expenses requested in the Application without further order of the  
20 court; provided, however, that in either case, the Firm will hold 20% of the amount of  
21 the fees paid in trust pending approval of such fees through a quarterly interim fee  
22 application.  
23

1           7.     The interim compensation and reimbursement of expenses sought in this  
2 Application are not final. Upon the conclusion of these cases, the Firm will seek fees  
3 and reimbursement of the expenses incurred for the totality of the services rendered in  
4 these cases. Any interim fees or reimbursement of expenses approved by this court and  
5 received the Firm (along with any retainer) will be credited against such final fees and  
6 expenses and may be allowed by this court.

7           The Firm respectfully requests that the Debtors pay compensation to the Firm as  
8 requested herein pursuant to and in accordance with the terms of the Compensation  
9 Procedures Order.

10           DATED this 17 day of January, 2024.

11  
12                                   CORR CRONIN LLP

13  
14                                   BY /s/ John T. Bender

15                                   John T. Bender, WSBA #49658  
16                                   Special Litigation Counsel for the Official Committee of  
17                                   Unsecured Creditors  
18  
19  
20  
21  
22  
23

# EXHIBIT A

<b>Timekeeper</b>	<b>Rate</b>	<b>Total Hours</b>	<b>Total Fees</b>
John Bender	\$500.00	41.10	\$20,550.00
Rachel Moran	\$220.00	2.30	\$506.00
<b>Total</b>		<b>43.40</b>	<b>\$21,056.00</b>

# EXHIBIT B

**CORR CRONIN | LLP**  
A Limited Liability Partnership  
1015 Second Avenue Floor 10  
Seattle, WA 98104-1001  
TEL: 206-625-8600 FAX: 206-625-0900  
Tax ID # 91-1952756

Official Committee of Unsecured Creditors

Page: 1  
11/30/2023  
Account No: 2233-00001M  
Statement No: 4

Re: iCap Creditor's Committee

FEES

					<u>RATE</u>	<u>HOURS</u>	
11/03/2023	JTB	B999	A114	General Administration: Call with J. Kornfeld re status and action items.	500.00	0.20	100.00
	JTB	B999	A114	General Administration: Call and email with J. Wax re revisions to application.	500.00	0.50	250.00
11/06/2023	JTB	B100	A114	Asset Analysis: Calls with J. Kornfeld re strategy.	500.00	0.40	200.00
	JTB	B100	A114	Asset Analysis: Call and email with J. Wax re strategy.	500.00	0.10	50.00
11/07/2023	JTB	B100	A114	Asset Analysis: Attend meeting with CRO Buchalter teams re status and action items.	500.00	1.00	500.00
	JTB	B100	A114	Asset Analysis: Attend meeting with Committee professionals re status of investigation and strategy.	500.00	1.00	500.00
	JTB	B100	A114	Asset Analysis: Call with J. Kornfeld re status and strategy.	500.00	0.40	200.00
11/08/2023	JTB	B999	A114	General Administration: Call with J. Kornfeld re committee logistics.	500.00	0.30	150.00
	JTB	B999	A114	General Administration: Email with G. Dyer re committee logistics.	500.00	0.10	50.00
	JTB	B999	A114	General Administration: Prepare for and committee meeting with B. Kornfeld and B. Riley teams.	500.00	1.20	600.00
	JTB	B100	A114	Asset Analysis: Attend meeting with CRO to discuss real estate issues.	500.00	1.00	500.00
	JTB	B100	A114	Asset Analysis: Call with J. Kornfeld re real estate issues.	500.00	0.20	100.00



Re: iCap Creditor's Committee

					<u>RATE</u>	<u>HOURS</u>	
11/09/2023	JTB	B100	A114	Asset Analysis: Attend and participate in UCC professionals meeting in advance of Committee meeting.	500.00	0.50	250.00
	JTB	B100	A114	Asset Analysis: Attend and participate in UCC meeting.	500.00	1.00	500.00
	JTB	B100	A114	Asset Analysis: Call with L. Tan and co-chair of UCC re status and strategy.	500.00	0.20	100.00
	JTB	B999	A114	General Administration: Communicate with B. Kornfeld re minute entry follow up.	500.00	0.20	100.00
	JTB	B999	A114	General Administration: Communicate with B. Kornfeld and witnesses re C. Christensen investigation.	500.00	0.20	100.00
	JTB	B100	A114	Asset Analysis: Review personnel interview notes taken by CRO.	500.00	0.50	250.00
	JTB	B999	A114	General Administration: Review CRO confidentiality agreement for approval and signature.	500.00	1.00	500.00
	JTB	B999	A114	General Administration: Correspond with Buchalter about confidentiality agreement.	500.00	0.20	100.00
11/10/2023	JTB	B100	A114	Asset Analysis: Email with B. Riley re iCap offering materials.	500.00	0.30	150.00
	JTB	B100	A114	Asset Analysis: Email with L. Miller re Salesforce access.	500.00	0.10	50.00
	JTB	B100	A114	Asset Analysis: Email with L. Miller; taskforce assignments.	500.00	0.20	100.00
	JTB	B999	A114	General Administration: Email with B. Kornfeld; taskforce assignments.	500.00	0.20	100.00
	JTB	B100	A114	Asset Analysis: Email with L. Miller re witness interviews.	500.00	0.20	100.00
	JTB	B100	A114	Asset Analysis: Email with B. Kornfeld re witness interviews.	500.00	0.20	100.00
	JTB	B100	A114	Asset Analysis: Call with B. Kornfeld re status of investigation and strategy.	500.00	0.40	200.00
	JTB	B100	A114	Asset Analysis: Call with B. Kornfeld re status and strategy continuous.	500.00	0.20	100.00
	JTB	B100	A114	Asset Analysis: Call with B. Kornfeld re status and strategy continuous.	500.00	0.30	150.00
11/13/2023	JTB	B100	A114	Asset Analysis: Call with Alchemy Construction; UW 17th.	500.00	0.40	200.00
	JTB	B100	A114	Asset Analysis: Call with J. Kornfeld re			

Re: iCap Creditor's Committee

					<u>RATE</u>	<u>HOURS</u>	
				status and strategy.	500.00	0.40	200.00
11/14/2023	JTB	B100	A114	Asset Analysis: Attend iCap Action items/update call.	500.00	0.90	450.00
	JTB	B100	A114	Asset Analysis: Attend iCap committee weekly meeting.	500.00	1.00	500.00
	JTB	B100	A114	Asset Analysis: Call with J. Kornfeld re litigation action plan.	500.00	0.20	100.00
11/15/2023	JTB	B100	A114	Asset Analysis: Receive and review October TRO report for C. Christensen.	500.00	0.20	100.00
	JTB	B999	A114	General Administration: Receive and review CRO common interest agreement; email with B. Kornfeld about same.	500.00	0.30	150.00
	JTB	B100	A114	Asset Analysis: Call with J. Kornfeld re UCC investigation status and strategy.	500.00	0.20	100.00
11/16/2023	JTB	B100	A114	Asset Analysis: Review Statement of Financial Affairs re email with Bush Kornfeld about same.	500.00	1.00	500.00
	JTB	B100	A114	Asset Analysis: Email with B. Riley re forensic investigation.	500.00	0.30	150.00
	JTB	B100	A114	Asset Analysis: Attend part of UCC forensic work group meeting.	500.00	0.20	100.00
	JTB	B100	A114	Asset Analysis: Email with J. Gurule and L. Miller re Umpqua 2004 requests.	500.00	0.20	100.00
	JTB	B100	A114	Asset Analysis: Call with Bush Kornfeld re UCC status and strategy.	500.00	0.30	150.00
	JTB	B100	A114	Asset Analysis: Call with Bush Kornfeld re UCC status and strategy cont.	500.00	0.20	100.00
11/17/2023	JTB	B999	A114	General Administration: Appear and attend 341 conference.	500.00	2.00	1,000.00
11/20/2023	JTB	B100	A114	Asset Analysis: Call with B. Kornfeld re UCC status and strategy.	500.00	0.70	350.00
	JTB	B100	A114	Asset Analysis: Email with B. Kornfeld re Umpqua 2004 motion.	500.00	0.20	100.00
	JTB	B100	A114	Asset Analysis: Email with Buchalter re witness interviews.	500.00	0.20	100.00
	JTB	B100	A114	Asset Analysis: Email with L. Tan re C. Christensen allowance issues.	500.00	0.20	100.00
11/21/2023	JTB	B100	A114	Asset Analysis: Call with J. Kornfeld re UCC investigation update.	500.00	0.70	350.00
	JTB	B100	A114	Asset Analysis: Call with M. Rhodes re			

Re: iCap Creditor's Committee

					<u>RATE</u>	<u>HOURS</u>	
			witness interview.		500.00	0.30	150.00
	JTB	B100	A114 Asset Analysis: Call with L. Tan re UCC investigation.		500.00	0.40	200.00
	JTB	B100	A114 Asset Analysis: Email with investor re respond to request for more information.		500.00	0.20	100.00
11/22/2023	JTB	B100	A114 Asset Analysis: Attend weekly UCC professionals meeting re status and strategy.		500.00	0.50	250.00
	JTB	B100	A114 Asset Analysis: Finalizing 2004 request to Umpqua.		500.00	0.50	250.00
	JTB	B100	A114 Asset Analysis: Email with known attorney for Umpqua about service of 2004 request.		500.00	0.30	150.00
	JTB	B100	A114 Asset Analysis: Supervising direct service of Umpqua 2004.		500.00	0.50	250.00
	JTB	B100	A114 Asset Analysis: Review of iCap SharePoint data.		500.00	3.00	1,500.00
	JTB	B100	A114 Asset Analysis: Email with UCC professional team re findings in iCap SharePoint data.		500.00	0.30	150.00
11/27/2023	JTB	B100	A114 Asset Analysis: Email with co-chair of Committee re witness interviews.		500.00	0.10	50.00
	JTB	B100	A114 Asset Analysis: Email with J. Kornfeld re witness interviews.		500.00	0.20	100.00
	JTB	B100	A114 Asset Analysis: Email with B. Kornfeld re preservation demand list.		500.00	0.10	50.00
	JTB	B100	A114 Asset Analysis: Email with Umpqua counsel re 2004 requests.		500.00	0.30	150.00
	JTB	B100	A114 Asset Analysis: Email with investor re lost iCap investment.		500.00	0.50	250.00
	JTB	B100	A114 Asset Analysis: Email with CRO team re SharePoint data and investigation.		500.00	0.50	250.00
	JTB	B100	A114 Asset Analysis: Review of iCap SharePoint data.		500.00	2.00	1,000.00
	JTB	B100	A114 Asset Analysis: Email with B. Riley team re iCap SharePoint data.		500.00	0.20	100.00
11/28/2023	JTB	B100	A114 Asset Analysis: Review of CRO internal iCap information.		500.00	0.50	250.00
	JTB	B100	A114 Asset Analysis: Conference with CRO team re follow up on review of internal information.		500.00	0.30	150.00

Re: iCap Creditor's Committee

				<u>RATE</u>	<u>HOURS</u>	
	JTB	B100	A114	Asset Analysis: Participate in iCap action items call with CRO and UCC professionals.	500.00	1.00 500.00
	JTB	B100	A114	Asset Analysis: Participate in iCap weekly UCC meeting.	500.00	1.00 500.00
	JTB	B100	A114	Asset Analysis: Conference with B. Kornfeld re UCC status and strategy.	500.00	0.30 150.00
	JTB	B100	A114	Asset Analysis: Call with B. Kornfeld re UCC status and strategy.	500.00	0.20 100.00
	JTB	B100	A114	Asset Analysis: Call with B. Kornfeld re UCC status and strategy continued.	500.00	0.20 100.00
	JTB	B100	A114	Asset Analysis: Call with Umpqua Bank's counsel re 2004 request	500.00	0.50 250.00
	JTB	B100	A114	Asset Analysis: Conference with Umpqua Bank's counsel re 2004 request follow up.	500.00	0.20 100.00
	JTB	B100	A114	Asset Analysis: Post-committee meeting iCap professionals call.	500.00	0.50 250.00
	JTB	B100	A114	Asset Analysis: Call with UCC co-chair re status and strategy.	500.00	0.30 150.00
	JTB	B100	A114	Asset Analysis: Call with UCC co-chair re status and strategy continued.	500.00	0.20 100.00
	JTB	B100	A114	Asset Analysis: Call with M. Rhodes re witness interview.	500.00	0.20 100.00
	JTB	B100	A114	Asset Analysis: Call with UCC co-chair and re iCap bankruptcy status.	500.00	0.30 150.00
	JTB	B999	A114	General Administration: Conference with internal team re case administration and assignments.	500.00	1.00 500.00
11/29/2023	JTB	B100	A114	Asset Analysis: Call with J. Kornfeld re UCC status and strategy.	500.00	0.50 250.00
	RM	B999	A114	General Administration: Coordinate various meetings and conference calls re start up of new case re Creditor's Committee.	220.00	1.00 220.00
11/30/2023	JTB	B100	A114	Asset Analysis: Communicate with UCC co-chair re interview questions for R. Zhang.	500.00	0.20 100.00
	JTB	B100	A114	Asset Analysis: Email from CRO re Sunset Terrace payment return.	500.00	0.20 100.00
	JTB	B100	A114	Asset Analysis: Attend UCC committee professionals weekly meeting.	500.00	0.20 100.00

Re: iCap Creditor's Committee

				<u>RATE</u>	<u>HOURS</u>	
JTB	B100	A114	Asset Analysis: Call with B. Kornfeld re UCC status and strategy.	500.00	0.30	150.00
JTB	B100	A114	Asset Analysis: Call with B. Kornfeld re UCC status and strategy continued.	500.00	0.30	150.00
JTB	B999	A114	General Administration: Call with CRO re litigation management issues.	500.00	0.70	350.00
RM	B999	A114	General Administration: Meet with T. Uy re bankruptcy database from B. Kornfeld and conduct conference call with legal assistants re same.	220.00	1.30	286.00
			FOR LEGAL SERVICES RENDERED THROUGH 11/30/2023		43.40	21,056.00

## SUMMARY OF TIME

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
John T. Bender	Lead Attorney	41.10	\$500.00	\$20,550.00
Renee Moran	Paralegal	2.30	220.00	506.00

Previous Balance	\$3,750.00
------------------	------------

<b><u>Total Due for Current Invoice 11/30/2023</u></b>	<b>21,056.00</b>
--------------------------------------------------------	------------------

TOTAL DUE	<u><u>\$24,806.00</u></u>
-----------	---------------------------

Aged Due Amounts					
<u>0-30</u>	<u>31-60</u>	<u>61-90</u>	<u>91-120</u>	<u>121-180</u>	<u>181+</u>
24,806.00	0.00	0.00	0.00	0.00	0.00

**Billing History**

<u>Fees</u>	<u>Expenses</u>	<u>Advances</u>	<u>Finance Charge</u>	<u>Payments</u>
24,806.00	0.00	0.00	0.00	0.00

Task Code Summary

		<u>Fees</u>	<u>Expenses</u>
B100	Asset Analysis	16500.00	0.00
B100	Asset Analysis	16,500.00	0.00
B999	General Adminsitration	4556.00	0.00
B900	Real Estate	4,556.00	0.00

Payment is due upon receipt of invoice.

HONORABLE WHITMAN L. HOLT

ARMAND J. KORNFELD, WSBA #17214  
AIMEE S. WILLIG, WSBA #22859  
JASON WAX, WSBA #41944  
BUSH KORNFELD LLP  
601 UNION STREET, SUITE 5000  
SEATTLE, WA 98101-2373  
Tel: (206) 292-2110  
Emails: jkornfeld@bskd.com  
awillig@bskd.com  
jwax@bskd.com

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WASHINGTON

In re

ICAP ENTERPRISES, INC., et al.,  
Debtors.<sup>1</sup>

No. 23-01243-WLH11  
(Jointly Administrated)

NOTICE OF SECOND MONTHLY  
FEE APPLICATION OF CORR  
CRONIN LLP FOR ALLOWANCE  
AND PAYMENT OF INTERIM  
COMPENSATION AND  
REIMBURSEMENT OF EXPENSES  
FOR THE PERIOD  
NOVEMBER 1, 2023 THROUGH  
NOVEMBER 30, 2023

<sup>1</sup> The Debtors (along with their case numbers) are iCap Enterprises, Inc. (23-01243-11); iCap Pacific NW Management, LLC (23-01261-11); iCap Vault Management, LLC (23-01258-11); iCap Vault, LLC (23-01256-11); iCap Vault 1, LLC (23-01257-11); Vault Holding 1, LLC (23-01265-11); iCap Investments, LLC (23-01255-11); iCap Pacific Northwest Opportunity and Income Fund, LLC (23-01248-11); iCap Equity, LLC (23-01247-11); iCap Pacific Income 4 Fund, LLC (23-01251-11); iCap Pacific Income 5 Fund, LLC (23-01249-11); iCap Northwest Opportunity Fund, LLC (23-01253-11); 725 Broadway, LLC (23-01245-11); Senza Kenmore, LLC (23-01254-11); iCap Campbell Way, LLC (23-01250-11); UW 17th Ave, LLC (23-01266-11); VH Willows Townhomes LLC (23-01262-11); iCap @ UW, LLC (23-01244-11); VH 2nd Street Office, LLC (23-01259-11); VH Pioneer Village LLC (23-01263-11); iCap Funding LLC (23-01246-11); iCap Management LLC (23-01268-11); iCap Realty, LLC (23-01260-11); Vault Holding, LLC (23-01270-11); iCap Pacific Development LLC (23-01271-11); iCap Holding LLC (23-01272-11); iCap Holding 5 LLC (23-01273-11); and iCap Holding 6 LLC (23-01274-11); Colpitts Sunset, LLC (23-01432-11); CS2 Real Estate Development LLC (23-01434-11); and iCap International Investments, LLC (23-01464-11).

TO: THE DEBTORS, THE OFFICE OF THE UNITED STATES TRUSTEE, AND  
OTHER PARTIES IN INTEREST

PLEASE TAKE NOTICE that the professionals listed on the chart below (the “Professionals”) have applied to the United States Bankruptcy Court for the Eastern District of Washington for allowance and payment of interim compensation for services rendered and reimbursement of expenses incurred during the period commencing November 1, 2023 and ending November 30, 2023 (the “Application Period”). As detailed below, the Professionals seek allowance and payment of interim compensation for fees of services rendered, plus the expenses incurred during the Application Period.

Professional’s Name	Title	Toal (100%) Fees Incurred	Total Requested in this Application (100% of Fees and Expenses)	Amount of Fees to be Applied to Open Invoices (80% of Fees)	Amount of Fees to be Held in Trust (20% of Fees)
John T. Bender	Partner	\$20,550.00	\$20,550.00	\$16,440	\$4,110.00
Rachel Moran	Paralegal	\$ 506.00	\$ 506.00	\$404.80	\$101.20
Total		\$21,056.00	\$21,056.00	\$16,844.80	\$4,211.20

Pursuant to the Order Granting Debtors’ Motion For Order Establishing Interim Fee Application and Expense Reimbursement Procedures which was entered by the court on November 17, 2023 [ECF No. 168], any party objecting to the allowance and payment of interim compensation and reimbursement of expenses as requested must file a written objection with the court and serve a copy of that objection upon the Professionals whose Monthly Fee Application are the subject of the objection, the Debtors and their counsel of record, the Office of the United States Trustee within fourteen (14) calendar days of the date that this Notice was mailed.

1 If an objection is timely filed and served, the Debtor will pay the Professionals  
2 whose application is the subject of an objection only the applicable percentage of those  
3 amounts not in dispute and will reserve any amounts in dispute for payment after the  
4 Court hears and resolves such dispute.

5 DATED this 17<sup>th</sup> day of January, 2024.

6  
7 CORR CRONIN LLP

8 BY /s/ John T. Bender

9 John T. Bender, WSBA #49658  
10 Special Litigation Counsel for the Official Committee of  
11 Unsecured Creditors  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23